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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

SANDISK CORPORATION,

Plaintiff,

v.

MOBILE MEDIA IDEAS LLC,

Defendant.

Case No. CV 11-00597 CW

**STIPULATED REQUEST AND
ORDER REGARDING
RESCHEDULING OF INITIAL CASE
MANAGEMENT CONFERENCE**

Pursuant to Civil L.R. 6-1(b), 6-2, and 16-2(e), Plaintiff SanDisk Corporation ("SanDisk") and Defendant Mobile Media Ideas LLC ("Mobile Media") in the above-captioned action through their respective counsel hereby submit this stipulated request that the Court reschedule the initial Case Management Conference, currently scheduled for May 31, 2011 at 2:00 p.m., for July 5, 2011 at 2:00 p.m., or as soon thereafter as the Court's schedule may allow.

WHEREAS, pursuant to the February 11, 2011, docket entry in the above-titled action, the Initial Case Management Conference in this action is currently scheduled for May 31, 2011 at 2:00 p.m. in the Oakland Division of the Northern District of California. (EFC No. 8.)

WHEREAS, on May 23, 2011, the Court issued an order denying Mobile Media's motion to dismiss. (ECF No. 24.) Specifically, the Court held that "[u]ntil MMI expressly covenants not

1 to sue SanDisk's customers for infringement of any of the patents-in-suit based upon past or
2 current versions of SanDisk's media player products, this case will not be dismissed." *Id.* at p. 6-
3 7.

4 WHEREAS, on May 24, 2011, Mobile Media provided SanDisk with a revised covenant
5 not to sue SanDisk's customers. SanDisk is in the process of considering the revised covenant
6 not to sue and Mobile Media's request to dismiss the litigation.

7 WHEREAS, the parties believe that in the interests of efficiency and of avoiding
8 unnecessary expenses, the Initial Case Management Conference that is currently scheduled for
9 May 31, 2011 at 2:00 p.m., should be rescheduled to July 5, 2011 at 2:00 p.m., which is the first
10 Tuesday after May 31, 2011 when both counsel for SanDisk and Mobile Media would be
11 available, or anytime thereafter.

12 THE PARTIES HEREBY SUBMIT THE STIPULATED REQUEST THAT:

13 The Initial Case Management Conference in this action be continued to July 5, 2011, at
14 2:00 p.m., or as soon thereafter as the Court's schedule may allow.

1 Dated: May 26, 2011

Respectfully submitted,

2 Jones Day

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4 By: /s/ Gregory L. Lippetz

5 Gregory L. Lippetz

6 Counsel for Plaintiff
SANDISK CORPORATION

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8 In accordance with General Order No. 45, Section X(B), the above signatory attests that
9 concurrence in the filing of this document has been obtained from the signatory below.

10 Dated: May 26, 2011

Respectfully submitted,

11 Sullivan & Cromwell LLP

12
13 By: /s/ Michael H. Steinberg

14 Michael H. Steinberg

15 Counsel for Defendant
MOBILE MEDIA IDEAS LLC

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18 **PURSUANT TO STIPULATION, IT IS SO ORDERED: The case management conference**
19 **will be held on July 12, 2011, at 2:00 p.m.**

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21 Dated: May 27, 2011

22 By: 
The Hon. Claudia Wilken

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